

## UNITED STATES DISTRICT COURT

FILED

for the

Western District of Texas

Midland Division

APR 26 2022

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY  DEPUTY CLERK

REXFORD LAMPTEY

Case No.

7:22cv 00100

(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

JOSHUA BRITTON

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	REXFORD LAMPTEY
Street Address	6904 LONGFELLOW RANCH RD
City and County	ODESSA, ECTOR
State and Zip Code	TEXAS 79765-2329
Telephone Number	732 - 763 - 4916
E-mail Address	REX.LAMPTEY@YAHOO.COM

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Pro Se 1 (Rev. 12/16) Complaint for a Civil Case****Defendant No. 1**

Name	JOUSHUA BRITTON
Job or Title <i>(if known)</i>	CHILD SUPPORT OFFICE
Street Address	6005 EASTRIDGE RD STE 100
City and County	ODESSA, ECTOR
State and Zip Code	TEXAS 79762 - 5378
Telephone Number	432 - 333 - 1464
E-mail Address <i>(if known)</i>	

**Defendant No. 2**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 3**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 4**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 USC 1983 , 18 USC 3571 , 32 CFR ; 536.77(a)(3)(vii) , 42 CFR 488.301, 18 USC 876 , 18 USC 1341

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the  
State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* Joshua Britton \_\_\_\_\_, is a citizen of  
the State of *(name)* Texas \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:  
Claims to be calculated with regards to The United States Government Fee Schedule.

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

All started in February 2019, in Odessa Tx.

As seeking help through the court system to get my daughter whom my Ex abandoned on me at a month old and abducted her at almost 2 years. During a court hearing on July 2021, a contract proposal was offered which I objected for being conspicuous and parties asked to come back later. In November, 2021, I stated getting threatening mails from Mr Britton, for enforcing the objected contract proposal on me, of which he is aware of the invalidity of the said contract. He then created a contract, an account associated with a debt in my name, intercepting my unemployment benefits, tax return and forcing it on my employer for garnishing me.

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. 50 / 50 custody and commitment to Pearl Lamptey.
2. Garnishment must stop upon receiving court documents.
3. Pay all monies taken with interest.
4. Created debt must be discharge.
5. Get compensated with regards to The United States Government Fee Schedule.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04 - 20 - 2022

Signature of Plaintiff

R . L

Printed Name of Plaintiff

Rexford Lamptey

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

### **Certificate of Service**

**This is to certify that a copy of this "Demand to Dismiss Ruling For Lack Of Subject Matter Jurisdiction has been served to the following:**

**Mr. Gaven D. Norris / Loveth Ogunbayo  
The Gaven Norris Law Office  
413 North Grant Avenue  
Odessa ,Texas 79761 – 5119.  
Tel: 432 279 – 0858.**

**The Office Of The Attonney General  
6005 Eastridge ,Suit 200  
Odessa,Texas 79762  
Tel:432 333-1464.**